

Presentment Date and Time: January 24, 2014 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: January 24, 2014 at 11:30 a.m. (Prevailing Eastern Time)

JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Jayant W. Tambe
Laura W. Sawyer

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re:	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
	:
-----X	

Chapter 11
Case No. 08-13555 (JMP)
(Jointly Administered)

**NOTICE OF PRESENTMENT OF STIPULATION AMENDING THE CLAIMS
LITIGATION SCHEDULE**

PLEASE TAKE NOTICE that the undersigned will present the annexed Stipulation Amending the Claims Litigation Schedule (the “Stipulation”) to the Honorable James M. Peck, United States Bankruptcy Judge, for signature on **January 24, 2014 at 12:00 noon (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulation, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **January 24, 2014 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Scheduling Order may be signed.

Dated: January 17, 2014
New York, New York

Respectfully submitted,

/s/ Benjamin Rosenblum
Jayant W. Tambe
Laura W. Sawyer
Benjamin Rosenblum
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

To:

Paul J. Lawrence
Kymberly Evanson
Pacifica Law Group
1191 2nd Avenue, Suite 2100
Seattle, WA 98101-2945
Attorneys for Tobacco Settlement Authority, an
Independent public instrumentality of the State
of Washington

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re:	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: Case No. 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
-----X	

STIPULATION AMENDING THE CLAIMS LITIGATION SCHEDULE

This stipulation (the “Stipulation”) is entered into by and between the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings, Inc. (“LBHI”) and its affiliated debtors (collectively, the “Debtors”), and (b) Tobacco Settlement Authority, an independent public instrumentality of the State of Washington (“Washington TSA” and together with the Debtors, the “Parties”).

WHEREAS, commencing on September 15, 2008, LBHI and the other Debtors commenced voluntary cases under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”) (Jointly Administered under Case No. 08-13555, the “Chapter 11 Cases”);

WHEREAS, on September 17, 2009, Washington TSA filed a proof of claim in the Lehman bankruptcy in the amount of \$47,046,214.01, (Claim No. 15016) and subsequently amended its proof of claim on October 12, 2009 to increase the claim amount to \$47,063,714.01 (Claim No. 37355);

WHEREAS, on September 12, 2011, Lehman filed a claim objection seeking to reduce and allow Washington TSA’s claim to \$4,325,931.16;

WHEREAS, on May 24, 2013, the Court so-ordered the Claims Litigation Schedule (the "Claims Litigation Schedule") for the Objection of Debtors and Debtors in Possession to Claims of Washington State Tobacco Settlement Authority;

WHEREAS, the Parties have agreed to amend certain dates in the Claims Litigation Schedule as reflected below; and,

WHEREAS, the Parties have entered into this Stipulation and agreed to be bound by its terms.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. The Claims Litigation Schedule shall be amended so that the Debtors' expert report(s) must be served no later than February 24, 2014.
2. The Claims Litigation Schedule shall be amended so that depositions of the Debtors' expert(s) must be completed no later than March 10, 2014.
3. The Claims Litigation Schedule shall be amended so that Washington TSA's rebuttal expert report(s), if any, must be served no later than March 24, 2014.
4. Nothing in this Stipulation shall effect any of the other dates set forth in the Claims Litigation Schedule.

IT IS HEREBY STIPULATED AND AGREED:

Dated: January 17, 2014

TOBACCO SETTLEMENT AUTHORITY, an
independent public instrumentality of the State of
Washington

By: 

Paul J. Lawrence
Kymberly Evanson
Pacifica Law Group
1191 2nd Avenue, Suite 2100
Seattle, WA 98101-2945
Tel. 206-245-1700
Fax 206-245-1750

*Attorneys for Tobacco Settlement Authority, an
independent public instrumentality of the State
of Washington*

LEHMAN BROTHERS HOLDINGS INC. AND
AFFILIATED DEBTORS

By: 

Jayant W. Tambe
Laura Washington Sawyer
Benjamin Rosenblum
JONES DAY
222 East 41st Street
New York, NY 10017-6702
Tel. (212) 326-3939
Fax (212) 755-7306

Attorneys for the Debtors

Dated: January __, 2014
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE